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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

BYRON EARL WALKER

Debtor(s)

**CASE NO. 25-40278-MXM-13
CHAPTER 13**

TD BANK, N.A.

Movant

vs.

BYRON EARL WALKER

Debtor(s)

**Hearing date: 3/27/2025
Hearing time: 9:30 a.m.**

AMENDED RESPONDENT/DEBTOR'S AFFIDAVIT

STATE OF TEXAS

COUNTY OF Hood

KNOW ALL MEN BY THESE PRESENTS:

BEFORE ME, the undersigned authority, on this day personally appeared **Byron Earl Walker**, who after being by me duly sworn and upon oath stated that he is over eighteen (18) years of age, of sound mind, and is qualified and competent in all respects to make this affidavit and to do so of his own personal knowledge, and he further stated that the following statements

are true and correct and based upon his personal knowledge:

1. Debtor, **Byron Earl Walker**, filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code in Case Number 25-40278-MXM-13 on or about 1/24/2025.
2. On or about 2/28/2025, Movant **TD BANK, N.A.** (hereinafter "Movant") filed a Motion for Relief From Stay seeking a lift of the automatic stay insofar as the property described in the Motion for Relief From Stay.
3. Debtor is in possession of the above-described property.
4. The above-described property is not a burden to the Bankruptcy Estate and should not be abandoned.
5. Debtor has in full force and effect an insurance policy on the above-described property.
6. Movant has indicated that Debtor does not have insurance on the 2023 Dodge Ram 2500 Vehicle Identification Number 3C6UR5CT2PG569312 and the 2023 Dodge Ram 2500 3C6UR5CL4PG569313. The Debtor does have insurance and is attached as Exhibit "A". The above-reference vehicles are used for the Debtor's business in the oil pipeline work.
7. Debtor would be caused irreparable injury and undue hardship if the Automatic Stay were lifted and Movant was granted leave to sell the property. Debtor uses the vehicles as part of his business. It is necessary to his reorganization. The vehicles are being paid through the Debtor's Chapter 13 Plan and Adequate Protection payments are being paid to TD Bank N.A. Debtor has funds in his business account sufficient to cover the \$2,500.00 deductibles for each vehicle

with TD Bank, N.A. The Debtor has attempted to get insurance deductibles for both comprehensive and collision at \$500.00 deductibles and no business insurance companies provide for this amount of deductibles.

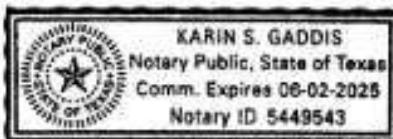
8. Debtor is current on his Chapter 13 Trustee payments.

WHEREFORE, Debtor respectfully requests that this Court deny Movant's Motion to Lift Stay.

SIGNED this the 20 day of March, 2025,


/s/
DEBTOR

SUBSCRIBED AND SWORN TO before me by the above-named Affiant on March , 2025, to certify which witness my hand and seal of office.




/s/
Karin S. Gaddis
Notary Public, State of Texas

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 21, 2025, a true and correct copy of the foregoing *Respondent/Debtor's Affidavit* was served on the following parties in interest by first class mail and/or ECF notification:

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Eric A Maskell

Eric A Maskell

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STANDING CHAPTER 13 TRUSTEE:

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U.S. TRUSTEE

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DEBTOR

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